

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

THE SHANE GROUP, INC. et al.	)	
	)	
Plaintiffs, on behalf of themselves	)	
and all others similarly situated	)	Case No. 2:10-cv-14360-DPH-MKM
	)	
v.	)	Judge Denise Page Hood
	)	Magistrate Judge Mona K. Majzoub
BLUE CROSS BLUE SHIELD	)	
OF MICHIGAN,	)	
	)	
Defendant.	)	

**NOTICE OF DOCUMENTS PREVIOUSLY  
FILED UNDER SEAL AGREED TO BE UNSEALED**

Pursuant to the Court's August 25, 2016 Scheduling Order [Dkt. #262], the Parties notified 66 Third Parties regarding their documents or testimony that the Parties previously filed under seal. *See* Notice of Service (Sept. 9, 2016) [Dkt. #265]. Exhibit 1 identifies the specific documents or testimony disclosed in previously-sealed filings that the Parties and Third Parties agree may be unsealed.

As of the close of business on Monday October 10, 2016:

- 25 Third Parties have agreed that their documents and deposition testimony may be unsealed;
- 3 Third Parties have indicated that they plan to pursue a motion to seal;
- 2 Third Parties have not made a final decision;
- 36 Third parties have not yet responded to the September 9 notice.

The Scheduling Order contemplates unsealing the previously filed exhibits via identification of those pages to be unsealed by page ID number. *See* Scheduling Order at 2 n.1. Because the documents were filed under seal, under applicable CM/ECF procedures they were not stamped with page ID numbers so the Parties cannot identify the exhibits in that manner. Therefore, to address this issue, the Parties intend to file on Friday, October 14, 2016 full versions of briefs previously filed under seal, making public the portions of those documents that the Parties and Third Parties have agreed they will not move to seal, along with public copies of the corresponding exhibits as listed in Exhibit 1 hereto.

Pursuant to the Scheduling Order, the Parties will file on November 1, 2016 an updated notice of documents agreed to by the Parties and Third Parties to be unsealed or not sealed.

This 11th day of October 2016.

/s/ Todd M. Stenerson

Todd M. Stenerson (P51953)

D. Bruce Hoffman

(Adm. E.D. MI, DC Bar 495385)

Neil K. Gilman

(Adm. E.D. MI, DC Bar 449226)

HUNTON & WILLIAMS LLP

2200 Pennsylvania Ave, N.W.

Washington, D.C. 20037

(202) 955-1500

tstenerson@hunton.com

bhoffman@hunton.com

ngilman@hunton.com

Thomas Van Dusen (P30602)  
Jason R. Gourley (P69065)  
Thomas Rheaume, Jr. (P74422)  
BODMAN PLC  
6th Floor at Ford Field  
1901 St. Antoine Street  
Detroit, Michigan 48226  
(313) 259-7777  
tvandusen@bodmanlaw.com

Robert A. Phillips (P58496)  
BLUE CROSS BLUE SHIELD OF  
MICHIGAN  
600 Lafayette East, MC 1925  
Detroit, MI 48226  
(313) 225-0536  
rphillips@bcbsm.com

*Attorneys for Defendant*

/s/ E. Powell Miller  
\_\_\_\_\_  
E. Powell Miller  
THE MILLER LAW FIRM, P.C.  
950 West University Drive, Suite 300  
Rochester, Michigan 48307  
(248) 841-2200

Daniel A. Small  
COHEN MILSTEIN SELLERS  
& TOLL PLLC  
1100 New York Avenue NW Suite 500  
Washington, D.C. 20005  
(202) 408-4600

Daniel E. Gustafson  
Daniel C. Hedlund  
GUSTAFSON GLUEK PLLC  
Canadian Pacific Plaza  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
(612) 333-8844

Fred T. Isquith  
Theodore B. Bell  
WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLC  
270 Madison Avenue  
New York, New York, 10016  
(212) 545-4690

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2016 I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to all parties of record. I further certify that I have caused the foregoing document to be sent by email or U.S. Mail to all individuals or entities who filed objections to the previous Settlement Agreement or, for those individuals or entities represented by counsel, their counsel.

/s/ Todd M. Stenerson  
Todd M. Stenerson  
2200 Pennsylvania Ave, N.W.  
Washington, D.C. 20037  
(202) 955-1500  
tstenerson@hunton.com

October 11, 2016

*Attorney for Defendant*